

**Disputed Issue: Lite Address Validation**

In order to provide service to a customer, a CLEC must first identify the location of that customer. A CLEC can identify a customer's location by one of two mechanisms: (1) the customer's service address; or (2) the customer's telephone number.

Ameritech currently requires a CLEC to identify a customer's location through address validation. A substantial number of xDSL loop orders are rejected by Ameritech as a result of the address validation requirement. Such rejections occur for two reasons: (1) Ameritech's OSS stores the same address in different databases, yet those addresses are not synchronized making it difficult for Covad to determine the correct format; and (2) Addresses contain many alphanumeric characters, spaces, and abbreviations that are difficult for computers to interpret. While complicated software programs may increase the likelihood of a successful address interpretation, it would require Ameritech to disclose the business rules for address storage – something that Ameritech has not yet done. In contrast, telephone number validation is quite simple. The telephone number contains exactly 10 alphanumeric characters and it is consistent across all Ameritech OSS databases. As a result, computer programs have no problems interpreting the telephone number which results in fewer order rejections.

Ameritech recognizes the benefit of using the telephone number versus the address to identify the customer location. This process of using only the telephone for customer identification has been referred to throughout the collaborative process as "Lite" Address Validation. Ameritech has committed to offer this option for other CLEC orders by December 2000. Ameritech refuses, however, to allow "lite" address validation for line sharing order because Ameritech artificially differentiates between local service requests that migrate a service from a local service request that adds data service to existing voice service. Ameritech's attempt to require "full" address validation (for line sharing orders) or "lite" address validation (for migrations) depending on the service provided to the customer is inappropriate. Covad maintains that there is no logical reason to differentiate between migrations and stand alone DSL loop or line sharing orders.

Accordingly, Covad requests that Ameritech include xDSL loop orders (and line shared orders) in the list that qualify for the "Lite" address validation by December 2000.

## **Disputed Issue – Loop Qualification**

### **Loop Availability Function**

- a) Covad has requested that Ameritech provide Covad and other CLECs with the spare loop availability functions available in its OSS. The ability to access such information is critical to allowing Covad and other CLECs to offer service broadly to Illinois consumers.

Covad's current menu of available xDSL services completely depends on Ameritech's loop selection process. Covad's ability to offer xDSL services varies depending on the loop's characteristics and length. Most customers are served by multiple loops. Each loop has slightly different characteristics and can support significantly different levels of service. When Covad requests a loop, Ameritech selects one out of the many that are available and offers it to Covad. Covad has no way of knowing what other loops may have been available or of requesting a different loop. It must accept the loop that is offered. Ameritech's process therefore restricts Covad to offering the DSL service that that one particular loop can support.

Loop availability functions already exist in the Ameritech OSS. Ameritech simply does not offer this functionality to Covad or other CLECs. Covad has requested access to the spare loop availability function in the SBC Advanced Services Collaborative. Covad provided Ameritech in the Illinois OSS collaborative with the specifics OSS functions to which it seeks. Ameritech has not yet addressed Covad's request.

Covad requests that Ameritech offer the loop availability function by December 2000.

### **Loop Reservation Function**

- b) Covad also seeks access to the loop reservation functionality in Ameritech's OSS. As previously mentioned, Covad's ability to offer a DSL service to a customer depends on the loop's characteristics and length. Under Ameritech's current process, Covad may qualify a customer for a particular DSL service based on the loop information provided during the pre-order phase, but ultimately be unable to provide that particular DSL service due to the loop actually provisioned by Ameritech. Because loop reservation would ensure that Ameritech would provision the loop capable of supporting the particular DSL service, loop reservation plays an integral roll in ensuring that a customer receives the service that Covad offered.

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Ameritech's OSS already reserves loops, but Ameritech does not offer this functionality to Covad or other CLECs. Covad requested access to this functionality in the SBC Advanced Services Collaborative beginning in January 2000 as a result of the FCC's Merger Conditions and reiterated and clarified its request in the Illinois OSS collaborative. Ameritech has not yet committed to provide Covad with the requested OSS functionality.

Covad requests that Ameritech offer loop reservation as a pre-ordering function to ensure that the loop used to qualify the order matches the loop provisioned. The loop reservation would be similar to a telephone number reservation with an expiration interval if Ameritech does not receive an associated order within the specified time frame. Covad requests that Ameritech offer to CLECs the loop reservation function by December 2000.

**Terminal Configuration Information**

- (c) As many Illinois customers are served by a remote terminals, Covad and other CLECs must be able to access and order a sub-loop in order to provide DSL service to those customers. When a customer is served by a remote terminal, CLECs need information about the feeder cable and transport medium between the central office and remote terminal because that feeder cable will dictate the alternatives for providing service to the customers. There are significant differences in how service is provided to the customer when the terminal is served by copper cable versus a fiber cable.

Because in some cases that terminal is served by a combination of copper and fiber, CLECs need access to the terminal configuration stored in Ameritech's OSS in order to determine which alternative is better for providing a DSL service. Such terminal configuration information would also assist Covad in planning for sub-loop ordering for terminals served by fiber feeder cables.

In the Advanced Services Collaborative, SBC/Ameritech acknowledged that many of its databases -- including LFACS and other such systems -- contain many functions that could be useful to the CLECs but have not yet been explored. One of those functions is terminal configuration inquiry. While SBC/Ameritech offered to meet with the CLECs to review the different functions existing in its OSS, that meeting has not happened due to a stalemate between SBC/Ameritech and the CLECs resulting from the numerous restrictions SBC/Ameritech placed on the audit CLECs were to conduct of SBC/Ameritech's OSS systems.

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During the Illinois collaborative, Covad provided specifics to Ameritech of the OSS terminal configuration inquiry it seeks. Ameritech has not yet committed to provide CLECs with the requested function. Covad requests that Ameritech begin offering CLECs access to the terminal configuration inquiry by December 2000.